

## REMARKS

By this response, Applicants have not amended the claims. As a result, claims 24-47 remain pending in this application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, the Office rejects claims 24-28, 30-39, and 41-47 under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 6,967,728 (Vidyanand). In order to establish a *prima facie* case of anticipation, the Office must show that Vidyanand describes each and every element as set forth in the claim. MPEP § 2131. Since the Office fails to show that Vidyanand describes each and every element of the claimed inventions, Applicants respectfully request withdrawal of these rejections.

For example, with respect to claim 24, the Office fails, *inter alia*, to show that Vidyanand describes previewing a document by generating a print file, transmitting the print file over a network, and receiving image data based on the transmitted print file as in claim 24. In support of its rejection, the Office cites Figs. 5-10 and col. 7, lines 61-67 as allegedly disclosing a method of previewing a document. Initially, Applicants note that these figures generally describe reusable and transferable printer preferences. See, e.g., Figs. 5-10; col. 4, lines 1-18; Abstract. Applicants submit that the reusable and transferable printer preferences of Vidyanand are unrelated to previewing a document.

Fig. 9 and col. 7, lines 61-67 of Vidyanand do include a page layout thumbnail preview 94 and a brief discussion thereof. However, Applicants note that the general setting interface 62 is included in a user interface 50 that is generated by a printer driver 14, which is disclosed as being located on a client computer 12. See, e.g., Figs. 1-4 and 9; col. 7, lines 44-47; and col. 7, line 61-col. 8, line 4. Further, Applicants note that Vidyanand does not discuss how the

thumbnail preview 94 is generated. As a result, Applicants submit that the printer driver 14 of Vidyanand generates the thumbnail preview 94 without any communications over a network, as is known in the prior art.

In contrast, Applicants' invention of claim 24 previews a document by generating a print file based on the document, transmitting the print file to a server over a network, and receiving image data based on the transmitted print file on the client over the network.

The Office cites Fig. 8 and col. 7, lines 32-44 of Vidyanand as allegedly disclosing generating a print file based on the document as in claim 24. However, Applicants note that this portion of Vidyanand merely discusses accessing a printer driver via an application on a client computer, which is unrelated to generating a print file based on a document as in claim 24.

Further, the Office cites Fig. 2 and col. 5, lines 45-64 of Vidyanand as allegedly disclosing transmitting the print file to a server over a network as in claim 24. However, Applicants note that this portion of Vidyanand merely discusses a set of printer driver preferences, which are required to successfully print a print job at a networked computer, and which are unrelated to transmitting anything allegedly disclosed as being generated in col. 7, lines 32-44 or a print file as in claim 24.

Further, the Office cites col. 5, lines 45-64 and col. 8, line 59-col. 9, line 52 of Vidyanand as allegedly disclosing receiving image data on the client over the network, the image data being based on the transmitted print file as in claim 24. Initially, Applicants note that since Vidyanand does not disclose transmitting a print file as part of previewing a document as discussed above, Vidyanand fails to disclose receiving anything based on a transmitted print file. Additionally, Applicants note that the cited portions of Vidyanand discuss a set of printer driver preferences, which are required to successfully print a print job at a networked computer (col. 5, lines 45-64),

and translating printer driver preferences for one printer for use on another printer (col. 8, line 59-col. 9, line 52). Applicants note that neither of the cited portions of Vidyanand include any discussion about image data, let alone receiving image data, which is based on a transmitted print file, on a client over a network as in claim 24.

In light of the above-stated reasons, either alone or in combination, Applicants respectfully request withdrawal of the rejections of claim 24 and claims 25-28, 30-31, and 44-47, which depend therefrom, as allegedly being anticipated by Vidyanand. However, should the Office maintain its rejections, Applicants respectfully request that the Office further explain:

- a) how Vidyanand's discussion of accessing a printer driver via an application on a client computer allegedly discloses generating a print file based on a document using a selected print driver;
- b) how Vidyanand's discussion of a set of printer driver preferences, which are required to successfully print a print job at a networked computer allegedly discloses transmitting the print file to a server over a network; and
- c) how Vidyanand's discussion of a set of printer driver preferences, which are required to successfully print a print job at a networked computer, and translating printer driver preferences for one printer for use on another printer allegedly disclose receiving image data on the client over the network, the image data being based on the transmitted print file.

With respect to claim 32, Applicants note that the Office relies on its interpretation of Vidyanand as allegedly teaching all the features of claim 24. To this extent, Applicants hereby incorporate the arguments presented above for claim 24. As a result, Applicants request

withdrawal of the rejection of claim 32 and claims 33-35, which depend therefrom, as allegedly being disclosed by Vidyanand.

With respect to claim 36, Applicants note that the Office relies on its interpretation of Vidyanand as allegedly teaching all the features of claim 24. To this extent, Applicants hereby incorporate the arguments presented above for claim 24. As a result, Applicants request withdrawal of the rejection of claim 36 and claims 37-39 and 41-43, which depend therefrom, as allegedly being disclosed by Vidyanand.

Further, the Office rejects claims 29 and 40 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Vidyanand in view of U.S. Patent Application Publication No. 2001/0043753 (Grohs). With respect to claims 29 and 40, Applicants respectfully submit that the Office fails to show that each and every feature of the claimed invention is taught or suggested by the Office's proposed combination of Vidyanand in view of Grohs. Applicants note that the Office relies on its interpretation of Vidyanand as allegedly teaching all the features of claims 24 and 36, from which these claims respectively depend. To this extent, Applicants hereby incorporate the arguments presented above for claims 24 and 36. Further, Applicants note that the combination of Vidyanand and Grohs, even if, *arguendo*, proper, fails to address the deficiencies of Vidyanand cited above with respect to claims 24 and 36. As a result, Applicants request withdrawal of the rejections of claims 29 and 40 as allegedly being unpatentable over the combination of Vidyanand and Grohs.

Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter.

Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the

various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

/John LaBatt/

John W. LaBatt, Reg. No. 48,301  
Hoffman, Warnick & D'Alessandro LLC  
75 State Street, 14th Floor  
Albany, NY 12207  
(518) 449-0044 - Telephone  
(518) 449-0047 - Facsimile

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